

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Timothy M. Donohue – TMD/6606
ARLEO & DONOHUE, L.L.C.
622 Eagle Rock Avenue
West Orange, New Jersey 07052
Tel: (973) 736-8660
Attorneys for Kevin Burton

United States,	:	Mag. No. 21-10198: (MAH)
	:	
v.	:	
	:	NOTICE OF MOTION TO MODIFY
Kevin Burton	:	BAIL CONDITIONS
	:	
	:	
	:	
	:	
	:	

TO: United States Attorney's Office
District of New Jersey
970 Broad Street
Newark New Jersey 07102
Attn: Keith Travers

PLEASE TAKE NOTICE that at the earliest date and time available to the Court the undersigned counsel for Kevin Burton will ask the Court to modify the bail conditions of the defendant to permit his immediate release on electronic monitoring.

PLEASE TAKE FURTHER NOTICE that the undersigned will rely upon the Certification of Counsel attached hereto and that counsel and defendant consent to the hearing in this matter being handled telephonically so as to permit an expeditious review of this matter.

ARLEO & DONOHUE, LLC
Counsel for Defendant

By: /s/ Timothy M. Donohue
Timothy M. Donohue